



151 West 42nd Street, 17th Floor  
New York, NY 10036

**John Margiotta**  
Partner

T 212.813.5957  
[jmargiotta@fzllz.com](mailto:jmargiotta@fzllz.com)

March 13, 2025

**VIA ECF**

Hon. Louis L. Stanton  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 1007-1312

Re: *Apollo Healthcare Corp. v. Sol De Janeiro USA Inc., et al.*, No. 1:22-cv-07719-LLS

Dear Judge Stanton:

We write to respond only briefly to opposing counsel's letter filed yesterday, March 12, 2025 (ECF 332) (the "Letter").

As the Court is aware, yesterday, before opposing counsel filed the Letter, we received a voicemail message from Chambers stating that the Court is able to start trial on May 20, May 27, June 3, June 10, or June 17 of this year, and indicating that the parties should meet and confer regarding scheduling and jointly choose a date. We also understand from the voicemail that the Court is not available after July 1.

We promptly forwarded this voicemail to opposing counsel before they filed the Letter, explained that we were now checking our witnesses' availability, and offered to meet and confer with them on this point during a meet-and-confer discussion the parties were already trying to plan for tomorrow regarding the pre-trial submissions due next week. Thus, it is not clear from our perspective why opposing counsel filed the Letter. We understand the Court to have already directed the parties to consider availability during the above periods and inform the Court soonest when they agree to begin trial. Unless otherwise ordered, Sol de Janeiro intends to proceed as instructed yesterday afternoon and hopes for opposing counsel's cooperation.

As to the remainder of the Letter, this is the first we have heard of any of the issues raised. As the Court might presume, there are two sides to every story – for now, we will leave it at that. If counsel seeks permission to make any new motions, or files any motions in limine, we will respond substantively as and when appropriate.

Respectfully Submitted,

/s/John Margiotta

John P. Margiotta  
cc: All Attorneys via ECF